

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In Re:)	Case No:	15-34090
Michael Losito)		
Cathy Marie Losito)	Chapter:	Chapter 13
Debtors,)		
)	Judge:	Jacqueline P. Cox

NOTICE OF MOTION

To: Michael Losito, □6156 Forestview Dr, Oak Forest, IL, 60452

Tom Vaughn, 55 E. Monroe St # 3850, Chicago, IL, 60603

OneMain Financial Group, LLC as service for Wells, 6801
Colwell Blvd., Mail Stop: NTSB: 1310, Irving, TX 75039

SEE ATTACHED SERVICE LIST OF ALL CREDITORS

PLEASE TAKE NOTICE that on the **March 6, 2017 at 9:00 a.m.**, I shall appear before the Honorable Judge Jacqueline P. Cox in 219 S. Dearborn St., Courtroom 680, Chicago, IL and then and there present the attached **MOTION TO AUTHORIZE RETENTION OF FUNDS**, a copy of which is attached hereto.

By: /s/ Kyle Dallmann
Kyle Dallmann

CERTIFICATE OF SERVICE

I, Kyle Dallmann, hereby certify that I served a copy of this Notice along with the aforementioned document upon the above parties, by causing the same to be mailed in a properly addressed envelope, postage prepaid, at 55 E. Monroe, Chicago, Illinois, before the hour of 5:30 p.m., on February 27, 2017.

By: /s/ Kyle Dallmann
Kyle Dallmann

Attorneys for the Debtors

Geraci Law L.L.C.
55 E. Monroe Street #3400
Chicago, Illinois 60603
(Ph): 312.332.1800 (Fax): 877.247.1960

AMC Mortgage Services
Attn: Bankruptcy Dept.
Po Box 11000
Santa Ana CA 92711

Citibank N.A.
C/O Portfolio Recovery ASS
120 Corporate Blvd Ste 1
Norfolk VA 23502

Atlantic Credit & Finance, Inc
Bankruptcy Dept.
PO Box 13386
Roanoke VA 24033

Clerk, Fifth Mun. Div.
Bankruptcy Dept.
10220 S. 76th Ave., #121
Bridgeview IL 60455

Clerk, Fifth Mun. Div.
Bankruptcy Dept.
10220 S. 76th Ave., #121
Bridgeview IL 60455

Blatt, Hasenmiller, Leibsker
Bankruptcy Dept.
10 S. LaSalle St. Ste 2200
Chicago IL 60603

Blitt and Gaines, PC
Bankruptcy Dept.
661 Glenn Ave.
Wheeling IL 60090

DELBERT SERVICES/Consu
Attn: Bankruptcy Dept.
Rodney Square N 1100 N M
Wilmington DE 18901

Atlantic Credit & Finance, Inc
Bankruptcy Dept.
PO Box 13386
Roanoke VA 24033

GMAC Mortgage
Attn: Bankruptcy Dept.
Po Box 4622
Waterloo IA 50704

Nations Recovery Center, Inc.
Bankruptcy Dept.
6491 Peachtree Industrial Blvd
Atlanta GA 30360

Onemain
Attn: Bankruptcy Dept.
Po Box 499
Hanover MD 21076

Capital ONE BANK USA N.A.
C/O Portfolio Recovery ASS
120 Corporate Blvd Ste 1
Norfolk VA 23502

PennyMac Loan Services
Bankruptcy Dept
PO Box 514387
Los Angeles CA 90051

Cash Net USA
Bankruptcy Dept.
PO Box 643990
Cincinnati OH 46264

Rise Credit
Bankruptcy Dept.
PO Box 101808
Fort Worth TX 76185

Cashcall INC
Attn: Bankruptcy Dept.
1 City Blvd W
Orange CA 92868

Silver Cloud Financial, Inc
Bankruptcy Dept.
635 East Hwy 20, C
Upper Lake CA 95485

Chase CARD
Attn: Bankruptcy Dept.
Po Box 15298
Wilmington DE 19850

US DEPT OF ED/Glelsi
Attn: Bankruptcy Dept.
Po Box 7860
Madison WI 53707

CITI
Attn: Bankruptcy Dept.
Po Box 6241
Sioux Falls SD 57117

WF CRD SVC
Attn: Bankruptcy Dept.
3201 N 4Th Ave
Sioux Falls SD 57104

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In Re:)	Case No:	15-34090
Michael Losito)		
Cathy Marie Losito)	Chapter:	Chapter 13
Debtors,)		
)	Judge:	Jacqueline P. Cox

MOTION TO AUTHORIZE RETENTION OF FUNDS

NOW COME the Debtors, Mr. & Mrs. Michael Losito (the "Debtors"), by and through their attorneys, Geraci Law LLC, to present their **MOTION TO AUTHORIZE RETENTION OF FUNDS**, and state as follows:

1. This Court has jurisdiction pursuant to 11 U.S.C. 1334 and this is a "core proceeding" under 28 U.S.C. 157(b).
2. The Debtors filed a petition for bankruptcy protection under Chapter 13 of the US Bankruptcy Code and a plan of reorganization on 10/06/2015.
3. On 12/21/2015, the Court confirmed the Chapter 13 plan.
4. The Debtors' 2001 Dodge Ram was totaled in an accident.
5. The insurance proceeds for the totaled vehicle exceed the balance of the car note by \$2,245.38.
6. The Debtors seek to use these funds to purchase a replacement vehicle so that they can avoid a lengthy financing agreement.

WHEREFORE, the Debtors, Mr. & Mrs. Michael Losito, pray that this Court enter an order authorizing the Debtors to retain the funds and for such further additional relief that this Court may deem just and proper.

/s/ Kyle Dallmann
Kyle Dallmann

Attorneys for the Debtors

Geraci Law L.L.C.
55 E. Monroe Street #3400
Chicago, Illinois 60603
(Ph): 312.332.1800 (Fax): 877.247.1960